

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES of AMERICA,

Action No. 1:04-cr-10286 PBS

v.

MICHAEL ALCOTT,
Defendant.

MOTION FOR INTERIM VOUCHER

NOW COMES defendant's counsel, Kevin Barron, and moves pursuant to the Criminal Justice Act for an order allowing counsel to submit an interim voucher and to allow quarterly billing thereafter, if necessary.

In support of this motion, counsel says as follows:

1. Counsel has pursued this case since May 2005. The case requires more time and attention than anticipated earlier. With the issuance of the first draft of the PSR, it is apparent that this case will continue for a few months more.

2. Given the time and resources expended on this increasingly complex case (for example, seven trips to Plymouth County Correctional Facility), counsel believes it fair to submit an interim voucher. Counsel has spoken to Senior Analyst Judith Litwin and she believes this motion is appropriate in the circumstances.

3. Counsel has avoided using this process in any case before in order to save court and administrative staff time. Given the pressures of this and other time-consuming CJA cases, it is necessary for counsel to submit a voucher.

4. Counsel requests leave to submit his statement forthwith.

Dated this 22nd day of November, 2005 at Boston, Massachusetts.

/s/ *Kevin L. Barron*

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